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1 November 1993

VIA MESSENGER DELIVERY

Mr. William Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: AT&T Petition For Rulemaking No. RM-8355

Dear Mr. Caton:

Enclosed for filing please find the original and five copies of Comments submitted by DOMTEL Communications, Inc. to AT&T's Petition For Rulemaking in the above-referenced proceeding.

Should you have any questions or require any further information, please contact the undersigned.

Very truly yours,

Judith D. O'Neill
Attorney for DOMTEL Communications, Inc.

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of	)	
	)	
Market Entry and Regulation	)	RM-8355
of International Common Carriers	)	
With Foreign Carriers Affiliations	)	

COMMENTS OF DOMTEL COMMUNICATIONS, INC. TO AMERICAN TELEPHONE AND TELEGRAPH'S PETITION FOR RULEMAKING

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Date: November 1, 1993

SUMMARY

DOMTEL Communications, Inc. (t/a TRICOM), a U.S. corporation, is the wholly-owned subsidiary of Telepuerto San Isidro, S.A., of the Dominican Republic. Its Comments suggest to the Commission that the result of AT&T's proposal in its Petition for Rulemaking is to erect new barriers to entry in the U.S. for foreign-owned carriers, at a time when such barriers may well be against U.S. interests not protective of them. That is, by its broad-brush approach, AT&T suggests that the Commission establish a *presumption* of discrimination on the part of all foreign-owned carriers seeking entry into the U.S. market, merely by virtue of being foreign-owned. AT&T suggests that a series of detailed "proofs" be made by the foreign-owned carrier in order to *rebut* the presumption before a carrier may be licensed in the U.S.. While unstated, presumably thereafter, the analysis established in the Commission's order in CC Docket 91-360 relating to regulatory classification of foreign-owned carriers as dominant or non-dominant would follow.

AT&T does not offer any body of factual evidence to support its bald assertion that the Commission's approach of analyzing each application on a case-by-case basis is insufficient. Indeed, this system allows the Commission to address unique issues uniquely, and to deal with non-threatening applications expeditiously. While the current system may be awkward for AT&T, as its "routine" petitions to deny filed against every application by a foreign-owned carrier reveal a general corporate strategy to oppose

potential competitors regardless of whether they do or do not serve the public interest, no substantive reason is offered as to why the current system is lacking.

AT&T's approach impedes the development of competition in foreign markets, which both it and the Commission have agreed is the most effective way to serve the public interest.

DOMTEL, the U.S. subsidiary of a new Dominican competitor, is the quintessential example of the detrimental impact of AT&T's approach. As the U.S. market is important to its parent, TRICOM, in order to establish itself as a credible competitor to the heretofore impenetrable monopoly of CODETEL/GTE in the Dominican Republic, the delay, expense and commitment of resources by the Commission and by DOMTEL which would be required to comply with AT&T's Proposed Rule, would actually impede, rather than encourage, competition in the Dominican Republic. This counterproductive result would be achieved in order to avoid the "risk" of discrimination by a foreign carrier which controls 3% of its home market, and who generically AT&T admits in other dockets is not in a position to rationally or reasonably discriminate against anyone.

Thus, if any new rule to create barriers to entry in the U.S. at a time when the U.S. is encouraging other countries to dismantle their barriers is logically justified, it should not apply in any aspect to affiliates of carriers of foreign countries which are new competitors in their own markets.

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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

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**COMMENTS OF DOMTEL COMMUNICATIONS, INC.
TO AMERICAN TELEPHONE AND TELEGRAPH'S
PETITION FOR RULEMAKING**

DOMTEL Communications, Inc. ("DOMTEL"), hereby comments on American Telephone and Telegraph's Petition for Rulemaking ("AT&T's Petition" or "the Petition"). AT&T's Petition is of substantial interest to DOMTEL because DOMTEL's Section 214 application for authority to provide service between the United States and the Dominican Republic and points beyond, filed on July 2, 1993, is currently pending before the Commission. AT&T has filed a petition to deny in that docket, which espouses the same broad-brush barrier to entry approach which AT&T now encourages in its Petition. *See* AT&T's Petition to Deny, File No. ITC-93-246 (Aug. 13, 1993).

I. INTRODUCTION

At the core of AT&T's Petition is its concern that entry of foreign-owned carriers into the U.S. market will give the *dominant* foreign affiliates of those carriers the

ability to leverage their foreign market power so as to discriminate in favor of their U.S. affiliates to the detriment of U.S. consumers and other U.S. carriers. In light of that concern, AT&T's Petition suggests somewhat illogically that all foreign-owned carriers affiliated with *dominant* or *non-dominant* foreign carriers (a) agree, *prior to entry*, to a number of conditions intended to minimize the ability of their foreign owners to leverage their foreign market power (whether they have it or not) in the U.S. market and (b) demonstrate, on the basis of a number of factors, that comparable entry opportunities exist for U.S. carriers in all countries in which the foreign-owned carrier's affiliate operates. *See* AT&T's Petition, Attachment I (hereinafter "Proposed Rule").

AT&T does not establish by any factual or even conjectural body of evidence that the Commission's current process of addressing entry of foreign-owned carriers on a case-by-case basis, with certain required procedures[1/], is not adequate, or supportive of the policy which the Commission has espoused around the world of not erecting barriers to entry[2/]. Indeed, erecting a barrier to entry based *solely* on the fact that the carrier is foreign-owned, as AT&T suggests here, is directly contrary to the principles which drove the Commission to reject blanket categorization of foreign-owned

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1/ *See Order, Authorization and Certificate, Acquisition of TLD of Puerto Rico,* 8 FCC 106, 108 (1992)(hereinafter *TLD Acquisition Order*).

2/ The current approach of examining each application on its own merits allows the Commission to distinguish among vastly different types of applicants and tailor conditions, where appropriate, to the particular case. Thus, the merger of two giant carriers, such as MCI and British Telecom -- which may raise for examination a variety of issues from tax, to antitrust, to international trade, as well as telecommunications regulation -- may be treated appropriately differently from the 214 Application of a foreign-owned carrier establishing contact with the U.S. for the first time on behalf of its affiliate which is a new entrant into a newly competitive environment in a foreign country.

carriers as dominant and instead, to regulate as dominant only those carriers who present a "substantial risk" of discrimination based upon control of foreign bottleneck facilities[3/].

It is logically at counter-purpose, therefore, with the Commission's mission of encouraging foreign governments to dismantle their existing barriers to entry of U.S. carriers, for the Commission to now erect new barriers to entry in the U.S.. Even if the Commission could rationalize such a barrier, AT&T's Proposed Rule is destructive of foreign competition due to its breadth. For example, foreign-owned 214 applicants whose foreign affiliates not only lack market power to discriminate, but who are the very new competitors which the Commission has encouraged abroad, would be directly impeded by the Commission from developing the competition which the Commission purports to foster. The Proposed Rule would create a dilatory, expensive barrier to entry for the new competitor into the important U.S. service area. This is because AT&T's chemotherapeutic approach, creates a *presumption* that all foreign-owned carriers' foreign affiliates are dominant and inclined to discriminate. The presumption is created merely by the fact of being foreign-owed. AT&T then suggests that each such carrier must *rebut* the presumption successfully through the extensive proceedings contemplated by the Proposed Rule in order to be licensed to enter the U.S. In an environment where the Commission has encouraged foreign administrations to eliminate their barriers, certainly creating one which frustrates the ability of a new foreign competitor to penetrate the discriminatory monopoly of a foreign PTT (even where that

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3/ Report and Order, *In the Matter of Regulation and International Common Carrier Services,* 7 FCC Rcd 7331, 7332, CC Docket No. 91-360 (1992) (hereinafter *Regulation of International Common Carrier Services*).

foreign PTT is U.S.-owned) is directly destructive of the Commission's attempt to open foreign markets to competition.

While AT&T may be appropriately concerned about the implications of its competitors' global alliances with foreign carriers, and while it is difficult for anyone to predict all implications of the strategic alliances into which AT&T and its competitors are entering presently, AT&T's summary conclusion that the "Commission's existing international regulatory and settlements policies, designed by the Commission in an earlier era, do not address satisfactorily the changing market structure" [4/] is sorely lacking as a reason for the U.S. to begin establishing barriers to entry, and to impede the growth of the very foreign competitors whom we have encouraged for the past 15 years.

II. A BARRIER TO ENTRY OF THE FOREIGN-OWNED AFFILIATE OF A NEW FOREIGN COMPETITIVE CARRIER WILL ARTIFICIALLY IMPEDE COMPETITION ABROAD: IF BARRIERS ARE TO BE RAISED, THEY SHOULD CAREFULLY EXEMPT NON-DOMINANT CARRIERS

A. AT&T Acknowledges that Fostering Competition and not Constraining Regulation Best Serves the Commission's Goals

AT&T acknowledges that "[t]he Commission's objective to rely on competitive market forces, where they exist, and to lessen its regulation where market forces are sufficient to protect U.S. ratepayers and carriers is consistent with longstanding U.S. policy."[5/] Furthermore, AT&T has admitted that rules regulating

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[4/] AT&T Petition at 2.

[5/] *Regulation of International Common Carrier Services,* AT&T Comments at 2, CC Docket No. 91-360 (Feb. 26, 1992) (hereinafter *AT&T Comments in Docket 91-360*).

entry in the U.S. market should vary based on the degree of market power of the particular foreign affiliate.[6/] Regulating is only a means to promote competition. "In truth," according to AT&T, "the only solution to foreign market power is greater competition in foreign markets." [7/]

Accordingly, AT&T argues its *own* case for freedom from classification as a dominant carrier by admonishing the Commission that:

> Continuing to classify AT&T as dominant, or regulating AT&T as if it were a dominant carrier, is not merely unnecessary, but counterproductive. The Commission has repeatedly found that direct economic regulation of carriers lacking market power interferes with the operation of competitive market forces and imposes both direct and indirect cost on users.[8/]

The Commission should exercise the same regulatory restraint and wisdom in regulating the entry of foreign-owned carriers affiliated with nondominant foreign carriers, so as to

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[6/] *Id.* at 23. AT&T there argued as to entry:

> Finally, as the U.S. carrier seeks Section 214 authorization, the Commission must also entertain specific proposals for appropriate additional conditions that may be necessary to protect U.S. interests on a case-by-case basis. In each case, the Commission's objective should be to design rules that are appropriate in light of the foreign market equivalency or lack thereof and the ability of the foreign affiliate to leverage its power in the U.S. to the detriment of consumers and carriers. (emphasis supplied).

[7/] *Id. at* 8 (footnote)(emphasis supplied). *Accord Regulation of International Common Carrier Services,* 7 FCC Rcd at 7334 ("competition, not governmental regulation, is the most effective, and therefore the most desirable, solution to market power").

[8/] *Motion For Reclassification of AT&T as a Nondominant Carrier,* at iii, CC Docket No. 79-252 (Sept. 22, 1993)(emphasis supplied) (hereinafter *AT&T Motion For Reclassification*). This Motion was filed by AT&T the same day it filed the within Petition.

prevent the U.S. from being a key impediment to the very competition it has fostered abroad.[2/]

The extensive factual inquiries, proposed proof of "comparable" trade barriers, and regulatory structures, however, would accomplish just the reverse if applied to all foreign-owned carriers regardless of a particular foreign affiliate's market power. It would be destructive of foreign competition, not encouraging of it.

B. Contradicting Itself on Encouraging Competition Aboard, AT&T Suggests the "Nuclear Attack" Approach to Entry of Foreign-Owned Carriers

Instead of artificially impeding competition in foreign markets, the Commission should continue to examine applications on a case-by-case basis as it has done in the past, assigning the appropriate conditions to each approval as suits the size and factual details of the matter and the authorization requested. This allows for rapid approval of affiliates of new competitors abroad, where the foreign affiliate controls insignificant market share and needs access to the U.S. in order to be a credible competitor to a prior foreign monopoly. Because of the success of the Commission's encouragement of competition globally, this scenario is likely to present itself repeatedly in the form of applications for 214 authority of foreign-owned carriers affiliated with new market entrants abroad. Thus, under its present process, the Commission retains

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[2/] While in its own motion to be reclassified as a non-dominant carrier AT&T argues that deregulation is a means to promote competition, in the within Petition, AT&T argues just the opposite. It now says that by creating this proposed barrier to entry, the U.S. may "continue to lead by example in liberalizing its market and promote global competition in telecommunications services...." AT&T Petition at 9. The irony here is that AT&T is suggesting the creation of a barrier to entry so as to lead the way in the world toward the elimination of barriers to entry.

leverage to control tightly those transactions which have the potential to create adverse impacts for U.S. users and carriers, while retaining the flexibility to be agile with new foreign carriers who promise desirable competition in former foreign monopoly environments.

A second alternative, would be to extend the test set forth in CC Docket 91-360 for classification as a dominant carrier, to entry of foreign-owned carriers. This is less desirable as it, too, impedes entry until potentially protracted factual proceedings are completed.

The least desirable approach, and the one which would call into question the Commission's own policy on liberalization, is the creation of new barriers to entry even for large, dominant, foreign virtual monopolies such as those who are the real subject of AT&T's Petition. Certainly, the most destructive approach possible, is to create a barrier to entry, and then apply it to small, foreign carriers who are attempting to compete in their home environment against large, established monopolies.

The Proposed Rule does this. It runs afoul of the Commission's original objective of encouraging competition abroad, so as to eliminate the economically detrimental strangle-hold which the Commission believes some foreign monopolies and dominant carriers have had on U.S. consumers.[10/] While the Proposed Rule, may, in AT&T's view, protect AT&T's corporate self-interest, it is difficult indeed to see how it protects the U.S. public interest.

10/ *See Regulation of International Common Carrier Services,* 7 FCC Rcd at 7332.

III. A PRESUMPTION THAT U.S. MARKET ENTRY WOULD BE IN THE PUBLIC INTEREST SHOULD BE ESTABLISHED WHERE THERE IS PRIMA FACIE NO FOREIGN MARKET LEVERAGE

Certainly, a rule which would assist AT&T to delay entry of foreign competitors for the sole purpose of AT&T's ability, together with its foreign monopolist or dominant correspondent, to better control the market to their respective corporate advantages, would not be in the public interest. Instead, an approach related to the threat or promise which a particular foreign-owned applicant presents is appropriate. This was the very thrust of the Commission's reregulation of its classification of dominant and nondominant status under *Regulation of International Common Carrier Services.*[11/]

While that matter deals with classification of regulatory status rather than entry, its goals are in harmony with the analysis here. That is, the Commission believed that its then-existing international dominant carrier policy was "overbroad, unnecessarily burdensome and may be detrimental to competition."[12/] Thus, instead of making all foreign-owned carriers dominant, the Commission elected to strike a balance which allows foreign competition to serve U.S. and foreign consumers' needs, while protecting U.S. carriers where there is a *real* threat of abuse, referred to by the Commission as a "substantial risk" of anticompetitive behavior.

Despite AT&T's previous statements on the limited usefulness of regulation and the need to focus on a foreign carrier's actual market power (see supra),

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11/ *Id.* at 7331.

12/ *Id.* at 7332.

what AT&T asks here is that the Commission abandon any sense of balance and make all foreign-owned carriers presumptively abusive of U.S. trade policy and thus incapable of being licensed, unless and until they rebut, in a separate proceeding, the presumptions that they will discriminate in favor of their foreign affiliates and that no comparable market opportunities exist in the foreign carrier's market.[13/] *See* AT&T's Petition at 5-9. It is not logical to think that this serves U.S. interests anymore than making all foreign-owned carriers automatically dominant served U.S. interests.

Accordingly, any rule which the Commission finds necessary to impose on its current system for the entry into the U.S. market of foreign-owned carriers should be structurally similar (i.e., with sufficient flexibility) to that for classification of regulatory status. That is, where the application makes a prima facie case that the market share of its foreign affiliate is not significant and that it does not control bottleneck facilities, the foreign-owned carrier should be deemed presumptively incapable of discriminating against other non-affiliated U.S. carriers and entry should be granted -- unless non-affiliated U.S. carriers are able to rebut the presumption with contrary facts, not tactical conjecture.[14/] This is consistent with AT&T's argument that "carriers lacking market

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[13/] AT&T acknowledges that "a number of the conditions proposed by [its Petition] are similar to those imposed by the Commission in the TLD case." AT&T Petition at 19 n.19. However, rather than apply such conditions on a case-by-case basis as the Commission stated it would do in international facilities based authorizations (TLD/Acquisition Order, 8 FCC at 113), AT&T would impose a full review on every section 214 applicant, regardless of circumstance.

[14/] To continue the above analogy of market entry regulation to the classification of regulatory status, in its CC Docket No. 91-360 the Commission opined that:

> Under the modifications adopted herein, most U.S.carriers will be classified as nondominant in their provision of international service on those routes

(continued...)

power cannot rationally charge unjust or unreasonable rates, or discriminate unreasonably."[15/]

In no event should a foreign carrier which has an insignificant market share in a foreign market open to all U.S. carriers be subject to the delay and the waste of Commission and corporate resources the Proposed Rule would impose on such carriers. Whatever regulatory approach the Commission chooses, it should forego the temptation to freeze its licensing function in all cases because certain large foreign carriers and strategic alliances present potentially difficult issues in their attempt to enter the U.S. market alone or with a U.S. strategic partner.[16/]

[14/] (...continued)
where the carriers do not have foreign affiliates with the ability to discriminate against unaffiliated U.S. carriers through control of bottleneck services or facilities on the foreign end.

Regulation of International Common Carrier Services, 7 FCC at 7338 (*emphasis supplied).*

[15/] *AT&T Motion for Reclassification,* at 16 (emphasis supplied).

[16/] As AT&T makes clear in its Petition, the impetus for its Proposed Rule lies in the recent efforts by large foreign carriers to enter the U.S. markets through foreign-owned affiliates (e.g., British Telecom and MCI Telecommunications Corporation's proposed alliance). *See* AT&T Petition at ii, 4. The issue of potential discrimination by foreign-owned carriers has been around for a fairly long time. AT&T has consistently resisted the potential entry of foreign-owned carriers, even where the facts are clear that such entry would be in the public interest, presumably because of the danger that the Commission could establish regulatory precedent which would be helpful to significant foreign carriers desiring to enter the U.S. market. It appears that in order to avoid losing some of its credibility by continually fighting the entry of even insignificant players (such as DOMTEL), AT&T has brought the issue to a head by its Rulemaking Petition. In fact, AT&T may be offering peace in the MCI/BT deal in exchange for implementation of the Proposed Rule. See 12 FCC Report No. 19, at 5 (Oct. 6, 1993).

IV. DOMTEL PROVIDES THE QUINTESSENTIAL EXAMPLE OF THE OVERBREADTH OF AT&T'S PROPOSED RULE AND THE UNNECESSARY REGULATORY BURDEN THE RULE COULD IMPOSE ON CARRIERS

DOMTEL has applied for Section 214 authority to provide service between the United States and the Dominican Republic and points beyond. DOMTEL is a U.S. corporation wholly-owned by Telepuerto San Isidro, S.A. of the Dominican Republic, trading as TRICOM. TRICOM is a newly-licensed carrier in the Dominican Republic which, after nearly 63 years of the previously impenetrable monopoly of Compania Dominicana de Telefonos ("CODETEL"), succeeded in being licensed in 1989 to provide a full array of telecommunications services in and to and from the Dominican Republic. CODETEL is wholly owned by GTE.

After protracted judicial and regulatory proceedings, the monopoly of CODETEL was partially penetrated in 1990. TRICOM and a century-old former Telex provider in the Dominican Republic, All America Cable and Radio ("AAC&R"), made limited in-roads. AAC&R was able to conclude an Interconnection Agreement with CODETEL, but *only after agreeing not to under-price CODETEL on international traffic by more than a certain margin so as to protect CODETEL's favorable flow of international traffic into its network.* TRICOM began constructing its own limited, largely wireless network in the country, and sponsored legislation which required CODETEL to interconnect other carriers into its network for the first time in the history of its monopoly. However, without acceding to the price-fixing which CODETEL demanded, TRICOM has not been able to conclude an agreement with CODETEL. The matter has been in arbitration for nearly three years.

As a result, TRICOM's facilities are limited, and represent a small percentage of the continuing virtual monopoly of CODETEL, as to facilities, customer base and revenues. Nevertheless, TRICOM has developed a subscriber base, offers cellular service and has been assigned a Central Office Code by BellCore. TRICOM has neither the leverage, nor the intention, nor the ability to discriminate against any unaffiliated U.S. carrier in favor of DOMTEL through control of bottleneck facilities. The following set of statistics clearly illustrate TRICOM's lack of ability to so discriminate:

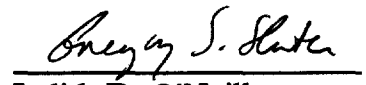
	Codetel	Tricom
Years in Operation	63	3
Employees (1992)	8,000	240
Number of Lines		
Business (main)	91,000	1,640
Business Extensions	39,000	265
Residential	360,500	97
Residential Extension	144,345	0
Pagers	9,926	0
Cellular Tels.	8,600	1,200
Coin Tels.	4,543	0
PBX & Key Systems	3,900	125
Cell Sites	14	4
Cell Voice Channels	472	72
Earth stations	3	1
International Circuits	2,600	96

Based on these statistics and the success in penetrating, after 63 years of a nearly impenetrable monopoly, DOMTEL represents the quintessential example of the need for a streamlined review process in such cases. The Commission should consider how it could justify an order under AT&T's Proposed Rule which would, in the name of public interest, delay the licensing of foreign-owned carriers in DOMTEL's position. It is difficult, indeed, to conjure a public interest argument here against facilitating the

entry into the foreign market of a new carrier, which after 63 years of CODETEL's monopoly that has cost Dominican and U.S. ratepayers hundreds of millions of dollars, stands the chance to bring lower cost communications to Dominican and U.S. subscribers alike. The longer DOMTEL's application is delayed, the longer CODETEL's now penetrated monopoly will preserve. Indeed, the credibility of the Commission's commitment to competition in foreign countries would be open to challenge by foreign governments to whom it might appear that U.S. policy disfavors monopolies abroad unless the monopoly is U.S.-owned.

The Commission's latest statement on market power is the most apt approach here: "competition, not governmental regulation, is the most effective and therefore the most desirable, solution to market power."[17/] To the extent AT&T's Petition has merit at all to avert dangerous ramifications of strategic alliances of large global carriers, it must be made consistent with longstanding U.S. policy so as to not deliberately or haphazardly destroy the very promise of the benefits of fair competition which it purports to seek to protect.

Respectfully submitted,



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17/ *Regulation of International Common Carrier Services*, 7 FCC Rcd at 7334.

Certificate Of Service

I, Gregory S. Slater, do hereby certify that on this 1st day of November, 1993, a copy of DOMTEL Communication, Inc.'s Comments, was mailed, postage prepaid, by U.S. first class mail, to the parties listed on the service list.

Gregory S. Slater

Gregory S. Slater

Date: November 1, 1993

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